

HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JUSTIN FRANKS,

Plaintiff,

v.

THE NIELSEN COMPANY (US), LLC;  
GRACENOTE, INC.; JOHN DOES 1-10,

Defendants.

No. 3:23-cv-06150-TMC

**STIPULATED MOTION TO EXTEND  
DEADLINE FOR JOINT STATUS  
REPORT AND RULE 26 INITIAL  
DISCLOSURES**

The parties to this action, by and through their undersigned counsel, respectfully submit this joint motion as follows:

1. On March 8, 2024, Plaintiff filed his First Amended Complaint. ECF No. 15.
2. On April 2, 2024, Plaintiff filed his Second Amended Complaint to add Title VII claims after exhausting administrative remedies. ECF No. 21.
3. On May 3, 2024, Defendants filed a Motion to Compel Arbitration, or In the Alternative, to Dismiss. ECF No. 24.

Stipulated Motion for Leave  
to Extend Deadline  
3:23-cv-06150-TMC  
Page 1

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

4. Plaintiff and Defendants respectfully request that this Court reset the due date for the parties' Joint Status Report and Rule 26 Initial Disclosures until after the Court has resolved the pending Motion to Compel Arbitration.

5. If Defendants' Motion to Compel Arbitration is granted, then there may be no need for these filings.

6. If Defendants' Motion to Compel Arbitration is denied, the parties respectfully request that the Court grant them 21 days after the relevant order is entered to file their Joint Status Report and exchange Rule 26 Initial Disclosures.

Respectfully submitted this 16th day of May 2024:

STOWELL & FRIEDMAN, LTD.

CORR CRONIN LLP

/s/ Linda Friedman

Linda D. Friedman ((Admitted *PHV*)  
303 W. Madison Street, Suite 2600  
Chicago, IL 60606  
(312) 431-0888 Phone  
(312) 431-0228 Fax  
lfriedman@sfltd.com

/s/ Blake Mark-Dias

Blake Marks-Dias, WSBA No. 28169  
Victoria E. Ainsworth, WSBA No. 49677  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104  
(206) 625-8600 Phone  
(206) 625-0900 Fax  
bmarksdias@corrchronin.com  
tainsworth@corrchronin.com

Jordan A. Taren, WSBA No. 50066  
SHISHIDO TAREN GOLDSWORTHY  
705 Second Avenue, Suite 1500  
Seattle, WA 98104  
(206) 622-1604 Phone  
jtaren@shishidotaren.com

Cardelle Bratton Spangler, *Admitted Pro Hac Vice*

WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601  
(312) 558-5600 Phone  
(312) 558-5700 Fax  
CSpangler@winston.com

Whitney Williams, *Admitted Pro Hac Vice*)

*Attorneys for Plaintiff*

Stipulated Motion for Leave  
to Extend Deadline  
3:23-cv-06150-TMC  
Page 2

CORR CRONIN LLP  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

WINSTON & STRAWN LLP  
333 S. Grand Avenue, 38<sup>th</sup> Floor  
Los Angeles, CA 90071-1543  
(213) 615-1700 Phone  
(213) 615-1750 Fax  
WhWilliams@winston.com


*Attorneys for Defendants*

**ORDER**

THIS MATTER having come before the Court on the agreed motion of the parties, the Court hereby orders that the parties' deadline to file a Joint Status Report and exchange Rule 26 Initial Disclosures is reset to 21 days after the Court rules on Defendants' Motion to Compel Arbitration, or in the Alternative, to Dismiss. Defendants and Plaintiff met and conferred and jointly agree to this motion.

IT IS SO ORDERED.

DATED this 17th day of May, 2024.

  
\_\_\_\_\_  
TIFFANY M. CARTWRIGHT  
United States District Judge

Presented by:

CORR CRONIN LLP

s/ Blake Marks-Dias

Blake Marks-Dias, WSBA No. 28169  
Victoria E. Ainsworth, WSBA No. 49677  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104  
(206) 625-8600 Phone  
(206) 625-0900 Fax  
bmarksdias@corrchronin.com  
tainsworth@corrchronin.com

Cardelle Bratton Spangler, *Admitted Pro Hac Vice*  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601  
(312) 558-5600 Phone

Stipulated Motion for Leave  
to Extend Deadline  
3:23-cv-06150-TMC  
Page 4

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

1 (312) 558-5700 Fax  
2 CSpangler@winston.com

3 Whitney Williams, *Admitted Pro Hac Vice*)  
4 WINSTON & STRAWN LLP  
5 333 S. Grand Avenue, 38<sup>th</sup> Floor  
6 Los Angeles, CA 90071-1543  
7 (213) 615-1700 Phone  
8 (213) 615-1750 Fax  
9 WhWilliams@winston.com

10 *Attorneys for Defendants*

11 STOWELL & FRIEDMAN, LTD.

12 /s/ Linda Friedman

13 Linda D. Friedman ((Admitted *PHV*)  
14 303 W. Madison Street, Suite 2600  
15 Chicago, IL 60606  
16 (312) 431-0888 Phone  
17 (312) 431-0228 Fax  
18 lfriedman@sfltd.com

19 SHISHIDO TAREN GOLDSWORTHY

20 Jordan A. Taren, WSBA No. 50066  
21 705 Second Avenue, Suite 1500  
22 Seattle, WA 98104  
23 (206) 622-1604 Phone  
24 jtaren@shishidotaren.com

25 *Attorneys for Plaintiff*